

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CALEB BARNETT, et al.,
Plaintiffs,

V.

KWAME RAOUL, et al.,
Defendants,

DANE HARREL, et al.,
Plaintiffs,

V.

KWAME RAOUL, et al.,
Defendants,

JEREMY W. LANGLEY, et al.,
Plaintiffs,

V.

BRENDAN KELLY, et al.,
Defendants,

**FEDERAL FIREARMS LICENSEES OF
ILLINOIS, et al.,**
Plaintiffs,

V.

**JAY ROBERT “J.B.” PRITZKER, et al.,
Defendants.**

Case No. 3:23-cv-209-SPM

****designated Lead Case**

Case No. 3:23-cv-141-SPM

Case No. 3:23-cv-192-SPM

Case No. 3:23-cv-215-SPM

DECLARATION OF PLAINTIFF JASMINE YOUNG

1. I, Jasmine Young, am a Plaintiff in the above-titled action. I am over the age of 18 and I make this declaration of my own knowledge, except as to any matters stated therein on information and belief, and as to such matters I believe them to be true. If called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am currently a resident of the State of Illinois and have been one continuously since before January 10, 2023.

3. I am not a police officer, retired police officer, prison warden, current member of the armed forces or national guard, nor do I work in armed security or private security contracting. I am thus not exempt from Protect Illinois Communities Act, House Bill 5471 (“PICA”)’s restrictions.

4. As of January 10, 2023, I owned or possessed at least one firearm and at least one ammunition feeding device suitable for self-defense purposes in Illinois.

5. I wish to lawfully acquire and possess within Illinois at least one new:

- a. semiautomatic rifle with a detachable magazine and a pistol grip, adjustable stock, barrel shroud, and flash suppressor, such as an AR-style semiautomatic rifle;
- b. semiautomatic pistol with a detachable magazine and threaded barrel; and
- c. semiautomatic shotgun with a pistol grip and either a detachable magazine or an internal magazine with a capacity of over 5 rounds.

6. PICA has injured me by precluding me from lawfully acquiring, possessing, or using, for any lawful purpose, any of the firearms identified in Paragraph 5, above.

7. But for fear of prosecution under PICA for doing so, I would acquire and possess each of the firearms identified in Paragraph 5, above, to maintain in my home for self-defense and to use for training, target-shooting, and competition.

8. I have a valid concealed carry license, issued by the State of Illinois.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on July 12, 2024, in Madison County, Illinois.


Jasmine Young
Declarant

CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2024, an electronic PDF of **DECLARATION OF PLAINTIFF JASMINE YOUNG** was sent by electronic mail to the following registered attorneys participating in the case:

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Dated: July 12, 2024

s/ Laura Palmerin
Laura Palmerin